

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO *ex rel.*
State Engineer

Plaintiff,

v.

ROMAN ARAGON, *et. al.*,
Defendants.

06 MAY 16 PM 3:06
69cv07941 JXC-ACE
CLEANING DATA FE

RIO CHAMA STREAM SYSTEM
Rutheron & Plaza Blanca, Section 7
Subfile No: CHRU-003-001

JOINT MOTION FOR EXTENSION OF TIME

COMES NOW Elizabeth T. Peralta and Alfred Q. Peralta, through their counsel, Padilla Law Firm P.A. (Ernest L. Padilla) and Norm Vogt, through his counsel, Cassutt, Hays & Friedman, P.A., (Gary S. Friedman) and in accordance with Rule 7 of the Federal Rules of Civil Procedure, and Rule 7.2 of the local rules of the United States District Court for the District of New Mexico, move to amend the February 17, 2005, Pretrial Order (No. 7765) and extend the deadlines for motions/objections and hearings set forth under that Order for Subfile CHRU-003-001, and in support thereof state as follows:

1. Defendants Elizabeth T. Peralta and Alfred Q. Peralta and Norm Vogt have entered into settlement discussions

and believe that a settlement will be reached in this matter.


2. An extension of the deadlines set forth in the Pretrial Order (No. 7765) is needed to facilitate settlement as follows: (a) the deadline to file any dispositive and limine motions and to object to proposed exhibits is extended to July 7, 2006 and (b) the deadline for the State to request a hearing is extended until August 7, 2006 and hearings shall be completed no later than September 1, 2006

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3. Edward G. Newville, attorney for the State of New Mexico, has been contacted regarding this Motion and he does concur.

WHEREFORE, Defendants, Elizabeth T. Peralta and Alfred Q. Peralta and Norm Vogt request that the Court grant the requested extension.

Respectfully submitted,
CASSUTT, HAYS & FRIEDMAN, P.A.

By: 
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By: (Telephonic Approval 5/9/06)
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(Approval 5/12/06)
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